

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

Plaintiff,

– against –

THE NEW YORK TIMES COMPANY,
a New York corporation,

Defendant.

No. 17 Civ. 4853

Hon. Jed S. Rakoff

ECF Case

PLAINTIFF’S NOTICE OF MOTION IN LIMINE

PLEASE TAKE NOTICE that, for the reasons explained in the accompanying Memorandum of Law, Plaintiff, Sarah Palin (“Gov. Palin”), by her undersigned attorneys, moves for the entry of an order precluding Defendants, The New York Times Company and James Bennet, from using, disclosing, discussing, and/or describing the contents of their proposed trial exhibits listed on **Exhibit A**, to which Gov. Palin will be asserting objections on January 17, 2022, in accordance with the Court’s *Individual Rules of Practice*, without first obtaining a ruling from the Court that such materials are admissible, including without limitation during jury selection, opening statements, witness examinations and cross-examinations, and at any other time in the presence of the jury.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s *Individual Rules of Practice*, Defendants’ must file any opposition papers on or before January 17, 2022.

Dated: January 10, 2022.

/s/ Shane B. Vogt

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CERTIFICATE OF SERVICE

I hereby certify that Plaintiff's Notice of Motion in Limine was filed electronically on January 10, 2022. This Notice will be sent by operation of the Court's electronic filing system to counsel of record for all parties as indicated on the electronic filing receipt. Parties and their counsel may access this filing through the Court's system.

/s/ Shane B. Vogt

Attorney